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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ASSUREDPARTNERS OF NEVADA,
LLC,

Plaintiff,

v.

L/P INSURANCE SERVICES, LLC;
DEANNA DEHART; COURTNEY PINO;
CHRISTOPHER "BRYCE" WARNER;
GIGI BRADLEY; and HEATHER PIATT;

Defendants.

Case No. 3:21-cv-00433-RCJ-WGC

**ORDER MODIFYING TEMPORARY
RESTRAINING ORDER (ECF NO. 17)**

Plaintiff, ASSUREDPARTNERS OF NEVADA, LLC ("Plaintiff") and Defendants L/P INSURANCE SERVICES, LLC ("LP") and DEANNA DEHART, COURTNEY PINO,

1 CHRISTOPHER “BRYCE” WARNER, GIGI BRADLEY, and HEATHER PIATT (“Employee
2 Defendants”) (collectively, “Defendants”), by and through their respective attorneys, hereby
3 stipulate and agree to the following modification of the temporary restraining order (“TRO”) (ECF
4 No. 17).

5 WHEREAS, the parties agree to modify the TRO with respect to the amount of time
6 necessary to complete discovery and prepare for the preliminary injunction hearing.

7 THEREFORE, IT IS HEREBY STIPULATED by and between the parties and ORDERED,
8 as follows:

9 1. With respect to the timing of discovery and scheduling of the preliminary injunction
10 hearing, currently set for Friday, October 15, 2021, the Parties agree to continue the preliminary
11 injunction hearing to November 15, 2021 if available on the Court’s calendar; or, in the alternative,
12 November 10, 2021. The Parties further agree that the TRO shall remain in place pending the
13 continued hearing.

14 2. The Parties agree to expand the expedited discovery ordered under the TRO to allow
15 for issuance of subpoenas for the deposition of no more than six (6) Restricted Clients or transferred
16 clients before the preliminary-injunction hearing, with each deposition not to exceed 3.5 hours.
17 Subpoenas to such third parties may require the third party’s appearance for deposition within seven
18 (7) days of service by e-mail or overnight mail of the deposition subpoena.

19 3. The Parties may agree to complete additional depositions not otherwise expressly
20 permitted by the TRO, as modified by this Order, before the preliminary-injunction hearing without
21 need for a Court order. If a Party believes it has good cause to take additional depositions for
22 purposes of the preliminary injunction hearing but not all Parties agree to permit such depositions,
23 the Party may submit a request to the Court.

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1 This Stipulation and Order is brought in good faith and not for improper purposes or to
2 cause undue delay.

3 Respectfully submitted,

4

5 **Dated: October 8, 2021**

LITTLER MENDELSON, P.C.

6 By: /s/ Z. Kathryn Branson
7 JAMES M. WITZ
8 THOMAS W. CARROLL
9 Z. KATHRYN BRANSON
10 *Attorneys on behalf of*
11 **L/P INSURANCE SERVICES, LLC**

12

13 **Dated: October 8, 2021**

FISHER & PHILLIPS LLP

14 By: /s/ Usama Kahf
15 USAMA KAHF
16 ALLISON L. KHEEL
17 *Attorneys for Plaintiff*
18 **ASSUREDPARTNERS OF NEVADA, LLC**

19

20 **Dated: October 8, 2021**

SNELL & WILMER

21 By: /s/ Paul Swenson Prior
22 PAUL SWENSON PRIOR
23 JANINE C. PRUPAS
24 ALEXIS RENEE WENDL
25 *Attorneys for Individual Defendants*
26 **WARNER, PINO, DEHART,
27 BRADLEY, AND PIATT**

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29 **IT IS SO ORDERED.**

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31 Dated: 12th day of October, 2021.

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